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Medical Center, LLC*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

LAKISHA LEWIS,

Plaintiff,

vs.

SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC, a Delaware Limited Liability
Company; DOES I-X; and, ROE Business
Entities I-X,

Defendants.

Case No.: 2:21-cv-00464-CDS-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINES FOR FILING
DISPOSITIVE MOTIONS AND
RESPONSES THERETO**

(SECOND REQUEST)

Plaintiff Lakisha Lewis (“Plaintiff”) and Defendant Sunrise Hospital and Medical Center, LLC (“Defendant”) (collectively, when possible, “the Parties”), by and through their respective counsel, hereby stipulate and agree to extend the time for the Parties to file dispositive motions in this action. Pursuant to the Court’s Order of August 23, 2022 Order (ECF 30), the current deadline for filing dispositive motions is Monday, December 12, 2022. Good cause exists for the proposed extension of time to file and respond to dispositive motions. The Parties previously filed three requests to extend discovery deadlines and this is the Parties’ second request to extend the dispositive motion deadline.

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I. REASONS TO EXTEND THE DISPOSITIVE MOTION DEADLINE

Defendant is requesting the additional four days to complete and file the motion. A new attorney was assigned to the case on November 21, 2022. The additional time will allow the new attorney and Defendant's inside counsel to complete the motion and coordinate the preparation of supporting affidavits. The Parties have agreed that a short continuance is warranted under these circumstances and Defendant has agreed to a commensurate extension of the Plaintiff's reply deadlines.

Based on the foregoing, the Parties have agreed that the dispositive motion deadlines should be extended in the following manner:

- Defendant shall file its dispositive motion no later than **Friday, December 16, 2022;**
- Plaintiff will file her opposition no later than **Tuesday, January 17, 2023;** and
- Defendant shall file its reply no later than **Tuesday, February 14, 2023.**

IT IS SO STIPULATED.DATED this 12th day of December, 2022.DATED this 12th day of December, 2022.

KEMP & KEMP, ATTORNEYS AT LAW

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C./s/ James P. Kemp/s/ Anthony L. Martin

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ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

December 12, 2022

DATE